

1 Paul T. Trimmer  
Nevada State Bar No. 9291  
2 Hilary A. Williams  
Nevada State Bar No. 14645  
3 **JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
4 Las Vegas, Nevada 89101  
[paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
5 [hilary.williams@jacksonlewis.com](mailto:hilary.williams@jacksonlewis.com)  
Tel: (702) 921-2460  
6 Fax: (702) 921-2461

7 *Attorneys for Defendant Golden Gaming LLC*

8  
9  
10 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 AKNEEKO A. CARNES, individually,

12 Plaintiff,

13 vs.

14 GOLDEN GAMING, LLC, a Domestic  
Limited-Liability Company; GORDON  
15 BORGWALD, individually; and GERALD  
CAHOON, individually,

16 Defendants.  
17

Case No. 2:21-cv-01409-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
GOLDEN GAMING, LLC TO FILE A  
RESPONSE TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT [ECF No. 15]**

**(First Request)**

18 Defendant Golden Gaming, LLC ("Defendant,") by and through its counsel, Jackson Lewis  
19 P.C., and Plaintiff Akneeko A. Carnes ("Plaintiff,") by and through her counsel, Lagomarsino  
20 Law, hereby stipulate and agree to extend the time for Defendant to file a response to Plaintiff's  
21 First Amended Complaint [ECF No. 15]. Defendant was served on October 26, 2021 with a copy  
22 of the First Amended Complaint [ECF No. 15]. Defendant's response to the First Amended  
23 Complaint [ECF No. 15] is currently November 16, 2021.

24 Plaintiff and Defendant have agreed to a three-week extension of time for Defendant to file  
25 a response to the First Amended Complaint [ECF No. 15]. Defendant shall, therefore, have an  
26 extension of time to respond to the First Amended Complaint [ECF No. 15] as follows:

27 1. Defendant's response to the First Amended Complaint [ECF No. 15] is currently  
28 due on November 16, 2021.

2. Plaintiff has announced her intent to file a second amended complaint, which would render Defendant's response to the First Amended Complaint [ECF No. 15] unnecessary.

3. Defendants shall have until December 7, 2021 to file a response to the First Amended Complaint [ECF No. 15].

4. This is the first request for an extension of time for Defendant to file a response to Plaintiff's First Amended Complaint [ECF No. 15].

5. This request is made in good faith and not for the purpose of delay.

6. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 16th day of November, 2021.

LAGOMARSINO LAW

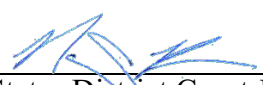
JACKSON LEWIS P.C.

/s/ Cory M. Ford  
Andre M. Lagomarsino, Esq., Bar No. 6711  
Cory M. Ford, Esq., Bar No. 15042  
3005 W. Horizon Ridge Pkwy., Suite 241  
Henderson, Nevada 89052  
Tel: (702) 383-2864  
*Attorney for Plaintiff Akneeko A. Carnes*

/s/ Hilary A. Williams  
Paul T. Trimmer, Bar No. 9291  
Hilary A. Williams, Bar No. 14645  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
*Attorneys for Defendant Golden Gaming LLC*

**ORDER**

IT IS SO ORDERED:

  
United States District Court Judge  
United States Magistrate Judge

Dated: November 17, 2021